NOV 1 7 2008

Appl. No.: 10/618566 Conf. No.: 3757

First named inventor: Luenberger, David

Filing date: 7/10/2003

Title: Methods for Assigning a Price to an Asset that is a Derivative of a

Non-Marketed Variable

TC/A.U.: 3693

Examiner: Wong, Eric Tak Wai

Docket No.: LUB-101/US

Customer No.: 30869

Commissioner for Patents

PO Box 1450

Alexandria VA 22313-1450

RESPONSE TO ACTION

Sir:

In response to the Office Action of 7/22/2008, please reconsider the above-identified application in view of the following amendments and/or remarks.